



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

September 19, 2013

**By Email (EngelmayerNYSDChambers@nysd.uscourts.gov)**

The Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

MEMO ENDORSED

**Re: United States v. William Chavis, et al., 13 Cr. 27 (PAE)**

Dear Judge Engelmayer:

The Government writes to advise the Court that, earlier today, the Government informed defense counsel that it intends to extend deferred prosecution agreements to each defendant in the above-captioned matter. The parties anticipate resolving this matter pursuant to such agreements. However, the parties require additional time to prepare, review, and finalize the agreements, and to arrange for travel to this District for the respective defendants to execute the agreements. Accordingly, the Government respectfully requests that the conference currently scheduled in the above-referenced case for September 20, 2013, at 4:00 p.m. be adjourned to a date and time that is convenient for the Court within approximately 45 days. The parties anticipate resolving this matter prior to that date, and will advise the Court immediately upon any developments in that regard.

In the event the Court grants this request, the Government also respectfully requests that, in the interests of justice, the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from September 4, 2013 through the date of the rescheduled conference. I have sought the consent of counsel for all defendants to these requests. Counsel for defendants Chavis and Gensel consent to these requests; counsel for defendant Matherson has not yet advised the Government of his position.

Very truly yours,

PREET BHARARA  
United States Attorney

By: /s/  
Adam Fee  
Assistant United States Attorney  
(212) 637-1589

**SO ORDERED:**

*Paul A. Engelmayer*

HON. PAUL A. ENGELMAYER  
cc: All Counsel of Record (via email)  
UNITED STATES DISTRICT JUDGE

9/16/13  
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*Granted. The conference is adjourned until November 8, 2013, at 10<sup>30</sup> AM. Time is excluded till then for the reasons indicated. See 18 USC § 3161(h)(7)(A).*